

**KESSLER TOPAZ
MELTZER & CHECK, LLP**

Peter A. Muhic (*Pro Hac Vice*)
Edward W. Ciolko
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

- and -

Eli R. Greenstein (SBN 217945)
One Sansome Street
Suite 1850
San Francisco, CA 94104
Telephone: (415) 400-3000
Facsimile: (415) 400-3001

Counsel for Plaintiffs and the Proposed Classes

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PATRICK URSOMANO, GIOVANNI
CANONICO and URSULA CANONICO ,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A., WELLS FARGO
INSURANCE, INC., ASSURANT, INC., and
AMERICAN SECURITY INSURANCE
COMPANY,

Defendants.

Case No.13-cv-04381-EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER TO RESET
DEADLINE FOR JOINT STATUS
CONFERENCE STATEMENT**

**Action Filed: September 20, 2013
Judge: Hon. Edward M. Chen**

Pursuant to Local Rule 6-1(b), 6-2, and 7-12, the parties respectfully request that the
Court reset the deadline for the Joint Status Conference Statement:

WHEREAS, on February 19, 2014, the Court set a status conference for March 20, 2014
at 10:30 a.m. with the Joint Status Conference Statement due a week before on March 13, 2014.
(ECF Doc. No. 50) to address the appropriateness of continuing the stay in light of the specifics
of the settlement proposed in *Fladell v. Wells Fargo Bank, N.A.*, No. 13-cv-60721 (S.D. Fla.).

1 WHEREAS, the Southern District of Florida held a hearing on the *Fladell* plaintiffs'
2 Motion for Preliminary Approval of Class Action Settlement on March 13, 2014.

3 WHEREAS, because Plaintiffs' counsel attended the preliminary approval hearing in
4 *Fladell* on March 13, 2014, Plaintiffs requested that Defendants stipulate to extending the
5 deadline for filing the Joint Status Conference Statement to March 14, 2014.

6 WHEREAS, the parties have agreed to stipulate to reset the deadline to submit the Joint
7 Status Conference Statement to March 14, 2014.

8 WHEREAS, the deadlines in this action have been previously modified pursuant to
9 stipulation or Court order on: December 4, 2013 (modifying briefing on Assurant, Inc. and
10 American Security Insurance Company's motions to dismiss, ECF Doc. No. 28); December 12,
11 2013 (extending Wells Fargo Bank, N.A. and Wells Fargo Insurance Company, Inc.'s time to
12 respond to Plaintiffs' Complaint, ECF Doc. No. 29); and February 12, 2014 (establishing a
13 briefing schedule on Defendants' motion to stay, ECF Doc. No. 47).

14 WHEREAS, this Stipulation shall have no effect on the schedule for this case.

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, subject to
16 the Court's approval:

- 17 • The Parties shall file their Joint Status Conference Statement on March 14, 2014.

18
19 **FILER'S ATTESTATION**

20 Pursuant to Civil L.R. 5-1(i)(3), I attest under penalty of perjury that concurrence in the
21 filing of the document has been obtained from all of the signatories.

22
23 **KESSLER TOPAZ
MELTZER & CHECK, LLP**

24 Dated: March 13, 2014

/s/ Peter A. Muhic
Peter A. Muhic (*Pro Hac Vice*)
Edward W. Ciolko
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706

Facsimile: (610) 667-7056
Email: pmuhic@ktmc.com
Email: eciolko@ktmc.com

- and -

Eli R. Greenstein
One Sansome Street, Suite 1850
San Francisco, CA 94104
Telephone: (415) 400-3000
Facsimile: (415) 400-3001
Email: egreenstein@ktmc.com

Attorneys for Plaintiffs and the Proposed Classes

SEVERSON & WERSON, P.C.

Dated: March 13, 2014

/s/ Philip Barilovits (with consent)
Philip Barilovits (Bar No. 199944)
pb@severson.com
Michael J. Steiner (Bar No. 112079)
mjs@severson.com
Mark D. Lonergan (Bar No. 143622)
mdl@severson.com
One Embarcadero Center, Suite 2600
San Francisco, CA 94111
Telephone: (415) 398-3344
Facsimile: (415) 956-0439

*Attorneys for Defendants Wells Fargo Bank, N.A.
and Wells Fargo Insurance, Inc.*

**SHEPPARD MULLIN
RICHTER & HAMPTON, LLP**

Dated: March 13, 2014

/s/ Peter S. Hecker (with consent)
Peter S. Hecker (Bar No. 66159)
phecker@sheppardmullin.com
David E. Snyder (Bar No. 262001)
dsnyder@sheppardmullin.com
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4109
Telephone: (415) 774-3155
Facsimile: (415) 403-6224

*Attorneys for Defendant s American Security
Insurance Company and Assurant, Inc.*

-and -

CARLTON FIELDS JORDEN BURT, P.A.

Frank G. Burt

fburt@cfjblaw.com

W. Glenn Merten

gmerten@cfjblaw.com

Richard D. Euliss

reuliss@cfjblaw.com

Brian P. Perryman

bperryman@cfjblaw.com

1025 Thomas Jefferson Street, NW

Suite 400 East

Washington, D.C. 20007-0805

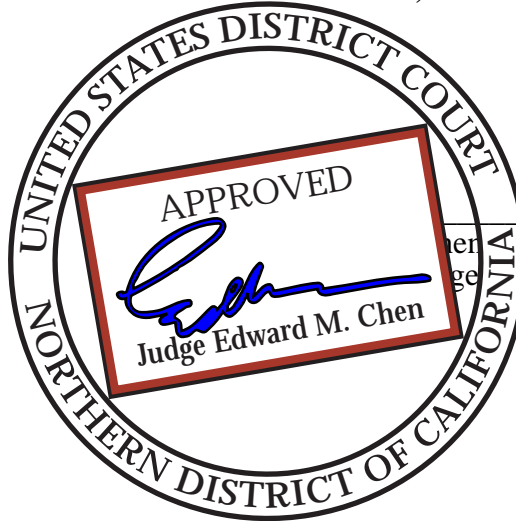
Telephone: (202) 965-8100

Facsimile: (202) 965-8104

*Attorneys for Defendants American Security
Insurance Company and Assurant, Inc.*

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.

Dated: 3/17/14



CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses of all counsel of record.

/s/ Peter A. Muhic

Peter A. Muhic